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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
The Connecticut Department of)	File No. NSD-L-99-62
Public Utility Control Petition for)	
Delegation of Additional Authority)	CC Docket 96-98 ✓
To Implement Area Code Conservation Measures)	

COMMENTS OF SBC COMMUNICATIONS INC.

In response to the Pubic Notice released on August 5, 1999, SBC Communications Inc., on its behalf and on behalf of its subsidiaries (collectively referenced as "SBC") endorses in part and opposes in part the request for a waiver of Section 52.19(c)(3) filed by the Connecticut Department of Public Utility Control ("CPUC") on July 28, 1999. The CPUC specifically requests the following authority: (1) to institute mandatory thousand number block pooling; (2) to require that the area code administrator reclaim unused exchange codes in thousand number blocks from carriers "with excess resources" and; (3) to audit number assignment and utilization requirements. SBC believes the CPUC currently has the authority to request the submission of utilization data and therefore does not require a waiver from the Commission in order to do so. However, SBC strongly opposes the CPUC's remaining requests.

As the Commission is aware from prior pleadings filed by SBC, SBC advocates national conservation policies that are designed to address the underlying causes of rapid area code exhaust. For this reason, it has encouraged the Commission to adopt a new comprehensive national numbering policy which includes the limited deployment of

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thousand-block number pooling in the top 100 metropolitan statistical areas ("MSAs") and the modification of area code relief policies to minimize customer inconvenience.

However, SBC does not support granting to the CPUC the authority to institute thousand-block number pooling in advance of a national policy. As the Commission has recognized, a national standard is imperative if area code depletion is to be effectively addressed. It is simply not efficient or cost-effective to allow state-by-state mandatory thousand-block number pooling. Nor is it supportable to require such pooling with regard to all area codes within a state. While SBC agrees with the CPUC that the concept of thousand-block number pooling is a viable means "to remedy the wasteful allocation and inefficient use of numbering resources," it is a drastic and costly measure which should be employed only where needed and where it provides the greatest benefit.

Similarly, SBC does not endorse the CPUC's request for authority to reclaim unused NXXs. The North American Numbering Plan Administration (NANPA) already has this authority. Unfortunately, the NANPA has failed to effectively exercise this authority in all cases where reclamation has been warranted. State commissions should work with the NANPA to accomplish reclamation in appropriate cases in accordance with established industry guidelines.

With regard to the CPUC's request to audit number assignment and utilization practices, SBC believes that the CPUC has the authority to order the submission of utilization data without the need for a waiver of the Commission's rules. However, the CPUC should not be granted the authority to audit number assignment procedures. The CPUC has failed to specify what data it plans to audit, what standards it will use to conduct the audit and how it will determine which service providers to audit. Without such defined parameters, the intent of the CPUC cannot be assessed. Moreover, SBC believes that audits should be conducted either by the NANPA or another neutral third party charged with assessing a carrier's compliance with industry guidelines.

Conclusion

As it has in previous filing, SBC encourages the Commission to adopt interim measures, including a waiver of 10-digit dialing with overlays and mandatory sequential thousand block number assignment management. However, it opposes the request of the CPUC and other state commissions for individual state authority to implement thousand-block number pooling, NXX reclamation and audits in advance of a national standard. State-by-state measures are not only unwarranted, but would detrimentally affect the implementation of the Commission's eventual number resource optimization policy.

Respectfully submitted,

SBC COMMUNICATIONS INC.

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September 7, 1999

CERTIFICATE OF SERVICE

On this 7th day of September 1999, I, Katie Turner, hereby certify that the Comments of SBC Communications Inc. in File No. NSD-L-99-62 have been served upon the parties listed in the Service List attached to the Comments of SBC Communications Inc.

/s/ Katie Turner

September 7, 1999

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